



Oregon

Theodore Kulongoski, Governor

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May 29, 2007

Todd Slater
Legacy Site Services LLC
486 Thomas Jones Way
Exton, Pennsylvania 19341

Re: Former Arkema Portland Plant
Draft Groundwater Source Control Evaluation
ECSI No. 398

Dear Mr. Slater:

The Oregon Department of Environmental Quality (DEQ) reviewed the April 17, 2007 *Draft Groundwater Source Control Evaluation Arkema Portland Facility* prepared by Integral Consulting, Inc. The draft evaluation was consistent with the directions DEQ provided Arkema regarding screening and data presentation. It also is generally consistent with the DEQ/EPA Portland Harbor Joint Source Control Strategy (JSCS). DEQ discussed Arkema's proposed evaluation approach for the area outside of the footprint of the proposed groundwater containment system with U. S. Environmental Protection Agency (EPA) Portland Harbor project staff and partners on a May 18, 2007 teleconference. During the teleconference, EPA provided the following direction.

1. EPA is using the DEQ/EPA JSCS screening level values (SLVs) as preliminary remedial action objectives for the purposes of meeting the removal action objectives identified in the Arkema/EPA Administrative Order on Consent for Removal Action Statement of Work. This translates into EPA's expectation that groundwater that is expected to discharge to the river above JSCS SLVs needs to be carried into the groundwater source control focused feasibility study (FFS).

Based on this EPA position, DEQ requests that the groundwater source control FFS evaluate options for treating and/or controlling the migration of groundwater from Lots 1 – 4 to the Willamette River that contains contaminants above JSCS SLVs. This includes groundwater that is attributable to off-site sources.

2. EPA further determined that the portion of the Rhone-Poulenc (RPAC) groundwater plume that crosses the Arkema site will need to be controlled at the Arkema riverbank on

a schedule consistent with the Arkema Early Action. This decision was made based on EPA's conclusion in the May 11, 2007 EPA Arkema Early Action Engineering Evaluation/Cost Analysis (EE/CA) Work Plan that the down stream boundary of the principle threat material (i.e., sediment evaluated for removal in the EE/CA) extends to the railroad bridge.

DEQ will direct Starlink Logistics, Inc. (SLLI) to adjust their groundwater source control strategy and schedule to match up with the Arkema Early Action. DEQ will review the pending groundwater monitoring results from the April 2007 sampling and provide direction to both SLLI and Arkema regarding groundwater plume management, and the need for additional characterization if necessary.

The following are specific comments provided by EPA on the draft groundwater source control evaluation.

- 1 Section 2, Paragraph 2: Regarding the weight-of-evidence discussion, EPA noted that upland source control needs to be completed in accordance with the SLVs presented in the Arkema Early Action EE/CA Work Plan, dated May 11, 2007.
- 2 Section 2, Paragraph 2: Regarding carrying contaminants of interest forward into the RI/FS process, EPA noted that upland source control needs to be completed in accordance with the SLVs presented in the Arkema Early Action EE/CA Work Plan, dated May 11, 2007.
- 3 Section 2, Paragraph 4: Regarding additional risk evaluation tools for groundwater contaminants of interest, EPA noted that upland source control needs to be completed in accordance with the SLVs presented in the Arkema Early Action EE/CA Work Plan, dated May 11, 2007.
- 4 Section 2.4: Based on information provided in the draft groundwater source control evaluation, no additional weight-of-evidence evaluation (i.e., proposed step 2 MCL quotient analysis) is necessary. EPA noted that upland source control needs to be completed in accordance with the SLVs presented in the Arkema Early Action EE/CA Work Plan, dated May 11, 2007.

The draft groundwater source control evaluation does not need to be resubmitted. Arkema should continue the preparation of the groundwater FFS and incorporate the EPA review comments as appropriate.

Please contact me at (503) 229-5538 if you have any questions.

Sincerely,

Matt McClincy
Project Manager
Portland Harbor Section

cc: Jim Anderson, DEQ NWR
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